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December 23, 2004

**MEMO ENDORSED**

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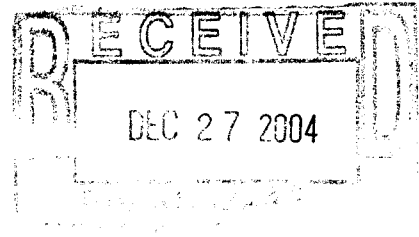
Hon. Frank Maas

United States Magistrate Judge

Daniel Patrick Moynihan United States Courthouse

500 Pearl Street, Room 740

New York, New York 10007-1312



**Re: American Steamship Owners Mutual  
Protection and Indemnity Association, Inc.  
v. Alcoa Steamship Co. et al. – 04 CV 4309 (LAK)**

Dear Judge Maas:

After circulating our letter dated December 22, 2004, it was called to our attention that we had omitted several entities that should also be named as defendants. We now enclose an Amended Proposed Order permitting plaintiff to amend its Second Amended Complaint to add additional defendants. Exhibit A to the amended Order contains seven defendants in addition to those listed in the original proposed Order: Alcoa Steamship Company, Inc., Amerada Hess Corporation, Central Gulf Lines, Inc., Marine Transport Lines, Inc., McAllister Brothers Inc. and Royal P&O Nedlloyd N.V. each of which was previously sued only as a successor to another entity plus Waterman Steamship Corp. (Lighters) which is related to a previous sued defendant, Waterman Steamship Corporation. The body of the proposed Order has been amended to accommodate the seven additional defendants.

Accordingly, we ask that the enclosed Amended Proposed Order be signed, not the version circulated yesterday.

*Any defendant opposing  
the relief requested is  
directed to return the Court's  
in writing by 1/7/05  
Frank Maas, USMT,  
12/21/04*

